

CHRISTIAN VIDEO MINISTRIES, INC.
P.O. Box 1466
San Antonio, Texas 78295-1466

Received & Inspected

MAY 10 2012

FCC Mail Room

April 30, 2012

Case Identifier: CGB-CC-0235

Mr. Roger Holberg, Attorney
Attention: Disability Rights Office, Room 3-B431
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Dear Mr. Holberg,

I am in receipt of your letter dated April 18, 2012 and DO desire to respond with additional information so that CHRISTIAN VIDEO MINISTRIES, INC., may be given further consideration in the extension of its 'closed caption' exemption.

Enclosed please find financial statement for 2011 as well as one for the first 2012 quarter. These statements readily give evidence that the process of 'closed captioning' on presently circulating taped sermons would be entirely too costly (in excess of two hundred thousand dollars).

Also enclosed is a list of the one satellite station (Lesea Broadcasting) and small cable stations from which CVM's program, DRAWING MEN TO CHRIST, is broadcast. Each station was called to ask if it is capable of doing 'closed captioning' and each responded negatively. Three such responses are enclosed.

As stated in previous correspondence, NO SOLICITATION for money has been made on the air as doing so would violate a principle set forth at the inception of CVM. All personnel are volunteers in order to save available money for air time and required taping supplies. CVM is operated on minimal funds but has a loyal following—many would be disappointed should the program be discontinued!

It has been my personal privilege and ministry to handle the TV correspondence for the twenty-six (26) years of broadcasting, and I can testify of the receipt of ONE 'closed captioning' inquiry! This is a visual medium in which the old saying, "A picture is worth a thousand words" is never more true! It concerns us that the 'closed captioning' would distort the picture and message. Please give this fact serious thought.

Mr. Holberg, we realize you have an awesome responsibility in deciding to which organizations an exemption will be granted, but ask sincerely that much consideration be given to CHRISTIAN VIDEO MINISTRIES, INC., in granting an exemption because it would be extremely burdensome (if not impossible) for this small, non-profit organization to meet the costs of 'closed captioning' now or the near future.

Thanking you in advance for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Janora Dunson". The signature is written in black ink and is positioned below the word "Sincerely,".

Mrs. Jerry Dunson, Sec.

CHRISTIAN VIDEO MINISTRIES, INC.

Enclosures: Original and two copies of Affidavit, Financial Trial Balances, List of Broadcast Stations, copies of three stations responses

AFFIDAVIT

STATE OF TEXAS

COUNTY OF PARKER

BEFORE ME, the undersigned authority, on this day personally appeared MRS. JERRY DUNSON (also known as JANORA DUNSON) duly authorized Secretary of CHRISTIAN VIDEO MINISTRIES, INC., known to me to be the person who subscribed her name below and who having first duly sworn by me, on oath deposes and says:

"After receiving letter from Mr. Holberg, attorney for the Federal Communications Commission, I am responding with further documentation that the process of 'closed captioning' would put an 'undue burden' on this small, non-profit organization now and in the near future. Most recent Financial Trial Balances are included for consideration as well as statements from TV stations noting that we have sought 'closed captioning' assistance (none of which is available).

CHRISTIAN VIDEO MINISTRIES, INC., was organized in 1984 for the sole purpose of filming, editing and broadcasting the chalk-talk sermons of a Baptist preacher, Dr. Peter S. Ruckman of Pensacola, FL. Dr. Ruckman illustrates his Sunday evening sermon in colored chalk, making for a most unusual and visual ministry. The saying, "A picture is worth a thousand words", suggests an alternative for the 'closed captioning'. This organization has been filming Dr. Ruckman and airing his chalk-talk sermons for over twenty-six (26) years. I have overseen the correspondence for as many years and say with assurance that one letter has been received inquiring about 'closed captioning'! Dr. Ruckman is a very sound Bible teacher and preacher, and while we would like everyone to see and hear these sermons, we know that the Gospel message is available in 'closed captioning' format for those who are really interested in God's Word. Additionally since this is a 'visual' ministry, the very fact that the 'closed captioning' would distort the picture for the viewer is not a good idea.

Costs for 'closed captioning' ads we've received indicate at least \$400 per tape which would run between two and three hundred thousand dollars (maybe more). We have many tapes in several formats in circulation. Please note that this organization has NO paid employees—all volunteers!

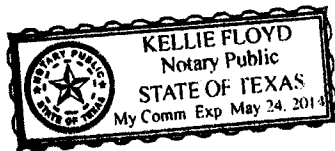
It is interesting to note that few viewers would benefit from the 'closed captioning'; however, these companies now soliciting our business to do the processing would benefit greatly. We have had many faithful viewers over the years that have helped this ministry by their 'unsolicited' gifts, and they would be sorely disappointed should this program not be able to air. Please let common sense be the 'rule' in this case and not 'closed captioning'!"

Further Affiant saith naught..

CHRISTIAN VIDEO MINISTRIES, INC., AFFIANT

BY *Janora Dunson*
JANORA DUNSON, Secretary

SUBSCRIBED AND SWORN TO by the said JANORA DUNSON, Secretary of CHRISTIAN VIDEO MINISTRIES, INC., a Texas non-profit corporation, on behalf of said non-profit corporation, this 4th day of May, 2012, to certify which witness my hand and seal of office.



Kellie Floyd

Notary Public in and for Parker County, Texas

Kellie Floyd

Printed Name of Notary

My commission Expires: May 24, 2014

List of Cable Stations and Phone Numbers

ACCESS ABQ CABLE CH-27, NM
ATTN: Steve Raniri 505-292-3174

ACCESS VISION-BATTLE CREEK, MI
ATTN: Vickie 269-968-3633

PUBLIC ACCESS CH-20-Buffalo, NY
ATTN: Rick Karnarth 716-558-8270

TIME WARNER (Fingerlake TV) a college facility
ATTN: None 585-394-3500

LCTV CH 20 LOCKPORT, NY
ATTN: Rich Zapp 716-434-1733

PAC-8 LOS ALAMOS, NM
ATTN: Jean Gindeau 505-662-7228

MCAT – MISSOULA, MONTANA
ATTN: Lori 406-542-6228

CH 12 COMMUNITY TV – POCATELLO, WA
ATTN: Kathy Oborn 208-234-6280

CNB COMCAST NETWORK – SPRINGFIELD, MA
ATTN: Robert Simpson 413-205-2908

CHARTER COMMUNICATION – WILLIAMATIC, CT.
ATTN: Sharon & Lynn 860-456-8500

SATELLITE: Leasea Broadcasting
ATTN: Rosemary Green 803-329-2768



Your Voice! Your Community!

Battle Creek Area
Community Television

May 3, 2012

Mrs. Jerry Dunson
Christian Video Ministries, Inc.
P.O. Box 1466
San Antonio, Texas 78295

Dear Mrs. Dunson,

I am writing to inform you that AccessVision is a nonprofit PEG (Public, Education, Government) Facility and as such, we do not have the capability to do closed captioning.

We do appreciate having the opportunity of airing your program "Drawing Men to Christ". Through the years we have had viewers call in and mention how much they enjoy the show, and we hope that you are able to continue providing AccessVision with programming.

Sincerely,

A handwritten signature in cursive script that reads 'Vickie Dunn'.

Vickie Dunn
Programming Manager

May 1, 2012

Ms. Janora Dunson
Christian Video Ministries
333 Silver Spur Dr.
Weatherford, TX 76087

Re: Closed Captioning
Christian Video Ministry
Dr. Peter Ruckman

Dear Ms Dunson,

Thank you for your recent inquiry regarding LeSEA Broadcasting's ability to provide closed captioning for our clients. Regretfully, the costs associated with purchasing the equipment, training and staffing a department to run such an operation remain prohibitive for LeSEA Broadcasting. As in prior years LeSEA continues to be unable to assist with providing closed captioning as a service to our clients. I am sorry. Should this change in the future you will be notified immediately.

With warmest regards,

Rosemary Green
L.G.

 leseabroadcastingnetwork

Rosemary Green
National Broadcast Sales

phone 803-329-2768
e-mail rgreen@lesea.com



A Nonprofit Organization

Missoula Community Access Television

500 N. Higgins, Suite 105 • P.O. Box 8749 • Missoula, MT 59807
(406) 542-6228 • FAX 721-6014 • E-mail: mcats@mcats.org

To: Video Christian Ministries
Mrs. Jerry Dunson
Re: Closed Caption on MCAT

Hello,

Missoula Community Access Television (MCAT) does not have Closed Caption capability at this time.

Thank you.

A handwritten signature in cursive script that reads 'Lori Hudak'.

Lori Hudak
Program Manager
Missoula Community Access Television

Christian Video Ministries
Trial Balance,
December, 2011

100	CASH	\$10,938.52	
110	PETTY CASH	\$100.00	
147	EQUIPMENT	\$405,253.58	
160	ACCUMULATED DEPRECIATION		\$397,436.68
280	CURRENT UNRESTRICTED FUND		\$10,934.32
305	CASH CONTRIBUTIONS		\$180,487.35
305	NON-CASH CONTRIB UTIONS		\$0.00
501	TAPE PURCHASE EXPENSE	\$0.00	
502	REPAIRS-EQUIPMENT	\$0.00	
503	OFFICE SUPPLIES	\$340.00	
504	FEES	\$1,900.00	
505	FREIGHT	\$569.17	
506	BANK CHARGE	\$49.70	
507	INSURANCE	\$0.00	
508	POSTAGE	\$349.79	
509	TELECASTING	\$ 165,585.00	
511	LITERATURE	\$3,728.59	
516	V IDEO SUPPLIES	\$44.00	
549	MISCELLANEOUS EXPENSE	\$0.00	
	SPECIAL MISSIONS ACCT	\$0.00	
		\$588,858.35	\$588,858.35

Christian Video Ministries

Trial Balance,
March, 2012

100	CASH	\$4,534.08	
110	PETTY CASH	\$100.00	
147	EQUIPMENT	\$405,253.58	
160	ACCUMULATED DEPRECIATION		\$397,436.68
280	CURRENT UNRESTRICTED FUND		\$18,855.42
305	CASH CONTRIBUTIONS		\$27,228.45
305	NON-CASH CONTRIB UTIONS		\$0.00
501	TAPE PURCHASE EXPENSE	\$0.00	
502	REPAIRS-EQUIPMENT	\$0.00	
503	OFFICE SUPPLIES	\$0.00	
504	FEES	\$1,900.00	
505	FREIGHT	\$58.41	
506	BANK CHARGE	\$9.90	
507	INSURANCE	\$0.00	
508	POSTAGE	\$86.98	
509	TELECASTING	\$ 30,445.75	
511	LITERATURE	\$1,077.85	
516	VIDEO SUPPLIES	\$0.00	
549	MISCELLANEOUS EXPENSE	\$54.00	
	SPECIAL MISSIONS ACCT	\$0.00	
		\$443,520.55	\$443,520.55